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December 2, 2022

Via ECF

Hon. José R. Almonte, U.S.M.J.
United States District Court for the District of New Jersey
Frank Lautenberg Post Office & U.S. Courthouse
2 Federal Square
Newark, New Jersey 07102

Re: **Rashad DeBose v. Dun & Bradstreet Holdings, Inc.**
Civil Action No: 2:22-cv-00209-ES-JRA

Dear Judge Almonte:

This firm represents Dun & Bradstreet Holdings, Inc. ("D&B") in the above referenced matter. We write to request, jointly and with the consent of plaintiff Rashad Debose ("Plaintiff" and collectively with D&B the "Parties"), a sixty-day extension of the current discovery deadlines.

As Your Honor may recall, D&B has moved to dismiss the complaint on a number of grounds, including under the First Amendment. The motion is fully briefed, and the parties have requested oral argument. Last week, Judge Esther Salas requested supplemental briefing from the Parties on a narrow set of First Amendment-related defenses raised by D&B in support of its motion. In order to comprehensively brief the complex and ostensibly dispositive questions of law posed by Judge Salas, on the precipice of the holidays, the parties jointly requested that Judge Salas enter a briefing schedule that extends through late January. Yesterday, Judge Salas entered the attached Order extending the supplemental briefing schedule through January 20, 2023.

In October, Your Honor entered a First Amended Scheduling Order that, among other things, extended fact discovery through February 2, 2023. As a result of the extended supplemental briefing schedule referenced above, it is unlikely that an answer will be filed within the existing discovery schedule. Given the critical nature of the supplemental briefing requested by Judge Salas, together with a fast-approaching deadline to complete fact discovery, including but not limited to the need to prepare and conduct depositions of D&B corporate representatives before February, the Parties agree to and jointly propose the attached extended discovery schedule.

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If granted, the extension will not slow the Parties' efforts to complete fact discovery. D&B has and will continue to make timely, rolling document productions, and the Parties will continue to negotiate and resolve discovery disputes in good faith as they present.

Thank you for Your Honor's consideration.

Respectfully submitted,

/s/ Michael R. O'Donnell

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